

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

APR 11 1996

In the Matter of)
Federal-State Joint Board on)
Universal Service)
)

CC Docket No. 96-45

DOCKET FILE COPY ORIGINAL

**COMMENTS OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION**

The National Emergency Number Association ("NENA") respectfully submits its comments on the Notice of Proposed Rulemaking ("Notice"), FCC 96-93 released March 8, 1996, in the above-captioned proceeding.

I. Access to Emergency 9-1-1 Services is Essential to the Public Safety.

New section 254(c)(1)(A) of the Communications Act of 1934, as amended, requires the FCC, in determining which telecommunications services to support, to consider those services which are "essential to education, public health or public safety."¹ The universal emergency telephone number system promotes the goal of protecting lives and property, and maintaining general community security. Hence, access to emergency 9-1-1 service clearly falls under the public safety standard, and the Notice acknowledges this at paragraph 16.

¹ Section 101(a), Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996).

046

II. Enhanced 9-1-1 Service Furthers the Rapid Deployment of Emergency Services and Therefore, is Essential to the Public Safety.

Enhanced 9-1-1 ("E9-1-1") service is also essential to the public safety. E9-1-1 service adds such capabilities as automatic number identification ("ANI"), automatic location information ("ALI"), and selective routing ("SR"). Because in many emergency situations the caller may hang up or be unable to communicate a location to 9-1-1 personnel,² these additional features become a necessity in deploying emergency services as soon as possible. E9-1-1 operators are able to ring callers back, assist the callers if possible,³ and dispatch emergency crews to the location on their screen, all in a matter of seconds. Should the FCC choose E9-1-1 as a core service to be supported by universal service, it will be helping to save lives in the process. This system can make the difference between life and death, especially in rural and insular areas where the speed and efficiency of response can sometimes be more critical than in urban areas.

III. Touch-Tone Calling Is Already Subscribed to By a Majority of Consumers and It Enhances the Speed of Emergency Calling.

Touch-tone calling should be a supported service for two main reasons: 1) It is a service that consumers already widely subscribe to; and 2) it is necessary for the enhanced speed for which it allows emergency calling.

First, Congress requires the FCC to take into consideration the extent to which touch-tone services have been subscribed to by a majority of residential

² For example, if a young child, a speech-impaired or otherwise handicapped person, or disoriented individual is not able to communicate a location to the emergency operator, the operator can still dispatch emergency services to the location of the caller because of the linked ANI and ALI features.

³ In some situations, the operators are able to instruct the caller on how to administer CPR, how to deliver a baby when a woman has gone into labor, and other procedures that may need to be applied before the emergency personnel arrive.

customers.⁴ In addition, the FCC must consider the extent to which touch-tone services are being "deployed in public telecommunications networks by telecommunications carriers."⁵ As the Notice has acknowledged in paragraph 19, touch-tone is widely subscribed to by consumers, as well as widely used by public telecommunication networks.

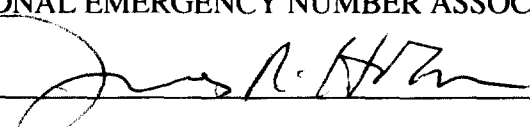
Second, touch-tone dialing, as opposed to pulse or rotary, is simply another mechanism that helps to ensure a speedy and efficient response for a community's emergency needs. When an individual is in a life or death situation, the seconds that are saved by having touch-tone dialing could be the difference between life and death.

IV. Conclusion

Emergency 9-1-1 service, enhanced 9-1-1 service and touch-tone dialing all qualify as essential to public safety. NENA urges the FCC to adopt these services as eligible for Federal universal support mechanisms.

Respectfully submitted,
NATIONAL EMERGENCY NUMBER ASSOCIATION

By


James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Ave., N.W., Suite 750
Washington, D.C. 20005-3934
(202) 371-9500

William E. Stanton
Executive Director
P.O. Box 1190
Coshocton, Ohio 43812-6190
(614) 622-8911

Nicole S. Batten
Catholic University of America
Columbus School of Law
LEGAL INTERN

April 11, 1996

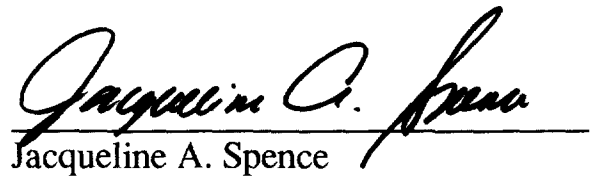
ITS ATTORNEY

⁴ § 254(c)(1)(B).

⁵ § 254(c)(1)(C).

CERTIFICATE OF SERVICE

I certify that I have sent, by hand or by facsimile or first-class mail, postage prepaid, the foregoing COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION to each of the Joint Board appointees and staff personnel per paragraph 149 of the Notice of Proposed Rulemaking and Order Establishing Joint Board issued on March 8, 1996 in the captioned proceeding.


Jacqueline A. Spence

April 11, 1996